

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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WINSTAR HOLDINGS, LLC and
IDT CORP.,

Plaintiff,

Civ. No.: 07 CV 4634 (GEL)
ECF Case

-against-

THE BLACKSTONE GROUP LP; IMPALA
PARTNERS, LLC; AND CITICORP

Defendants.

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PLAINTIFFS' MOTION TO REMAND

Plaintiffs Winstar Holdings, LLC and IDT Corp. ("Plaintiffs") hereby respectfully request that the Court enter an order: (a) acknowledging no right of removal for lack of "relatedness" under 28 U.S.C. §1334(b) or pursuant to the mandatory abstention provisions of §1334(c)(2); or, in the alternative, (b) abstaining from exercising this Court's jurisdiction pursuant to permissive abstention under §1334(c)(1) or equitably under §1452(b), and remanding the Lawsuit to the Supreme Court of the State of New York. The Court also should deny Impala's "request" to transfer this Lawsuit the Bankruptcy Court of the District of Delaware.

Dated: New York, New York
July 1, 2007

Respectfully submitted,

s/ Joseph M. Vann

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-and-

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